

# **Exhibit S**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ROADSYNC, INC.,

Plaintiff,

v.

RELAY PAYMENTS, INC.,  
SPENCER BARKOFF,  
JAMES RYAN DROEGE,  
and DOES 1-10,

Defendants.

Case No. 1:21-CV-03420-MLB

**DEFENDANTS' SIXTH SET OF REQUESTS  
FOR PRODUCTION TO ROADSYNC, INC.**

PLEASE TAKE NOTICE that pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Relay Payments, Inc., Spencer Barkoff, and James Ryan Droege ("Defendants") hereby serve their sixth set of Requests for Production ("RFP") to Plaintiff RoadSync, Inc. ("RoadSync" or "Plaintiff"). Responsive documents must be produced within 30 days of these requests. Each of the following requests is subject to the definitions and instructions that follow.

**DEFINITIONS AND INSTRUCTIONS**

Defendants incorporate by reference the Definitions and Instructions set forth in Defendants' First Set of Requests for Production to RoadSync, Inc., dated October 14, 2022, as if fully set forth herein.

**REQUEST FOR PRODUCTION NO. 89:**

All documents and communications from RoadSync to any employees containing or constituting notice as set forth in 18 U.S.C. § 1833(3)(A).

DATED: June 2, 2023

*/s/ Ellyde R. Thompson*

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*Counsel for Defendants Relay Payments, Inc.,  
Spencer Barkoff, and James Ryan Droege*

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, the within and foregoing has been forwarded via electronic mail to all counsel of record.

Dated: June 2, 2023

*/s/ Elisabeth B. Miller*

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